

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

BRADLEY THOMAS, &)	
LAURIE THOMAS)	
)	
Plaintiff,)	
)	
v.)	1:06-CV-165
)	
NCB MANAGEMENT SERVICES,)	
INC., & JOHN HARDING,)	
INDIVIDUALLY)	
)	
Defendants.)	

**NCB MANAGEMENT SERVICES, INC.'S RESPONSE
TO PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS**

COMES NOW, the Defendant, NCB MANAGEMENT SERVICES, INC., by and through its undersigned counsel of record, and in response to Plaintiff's First Request for Admissions shows as follows:

1. Plaintiff is a "consumer" as that term is defined by 15 U.S.C. Sect. 1692a(3).

RESPONSE: Admit.

2. The debt you sought to collect from plaintiff is a "debt" as is defined at 15 U.S.C. Sect. 1692a(5).

RESPONSE: Admit.

3. Your are engaged in the collection of debts from consumers using the mail and telephone and you regularly attempt to collect consumer debts alleged to be due another.

RESPONSE: Admit.

4. You are a “debt collector” as that term is defined by the Fair Debt Collection Practices Act, 15 U.S.C. Sect. 1692a(6).

RESPONSE: Admit.

5. The Fair Debt Collection Practices Act, 15 U.S.C. Sect. 1692 et. seq., applied to the collection of the debt you sought to collect from plaintiff.

RESPONSE: Admit.

6. The underlying alleged debt was incurred for personal, family, or household purposes.

RESPONSE: Denied.

7. No formal verification of the debt was provided to either Plaintiff by Defendant.

RESPONSE: Denied.

8. You violated the Fair Debt Collection Practices Act, 15 U.S.C. Sect. 1692 et seq., in your attempts to contact third-parties to collect the alleged debt from plaintiffs.

RESPONSE: Denied.

9. At the time contact was made with the third-parties to help you try and collect the alleged debt from plaintiffs, you knew the location of the Plaintiff's by mailing address, telephone number and other information necessary to communicate with Plaintiffs.

RESPONSE: Denied.

Respectfully submitted,

/s/Michael P. Barratt
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CERTIFICATE OF SERVICE

I hereby certify that I have this 30th day of August, 2006, served a copy of the foregoing upon counsel to all parties to this proceeding by placing the same in the United States mail, properly addressed and first-class postage prepaid.

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/s/ Michael P. Barratt

OF COUNSEL